

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

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TERRAN BIOSCIENCES, INC., *et al.*,

*Plaintiffs,*

v.

COMPASS PATHFINDER LIMITED,  
*et al.*,

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*Defendants.*

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Civil Action No. ELH-22-1956

**PLAINTIFFS’ REPLY IN SUPPORT OF SEALING THE ENTIRETY OF THE MASTER  
LICENSING AGREEMENT OR IN THE ALTERNATIVE SEALING PORTIONS OF  
THE MASTER LICENSING AGREEMENT**

Plaintiffs, Terran Biosciences, Inc. (“Terran”) and Professor Scott Thompson (together, “Plaintiffs”), respectfully submit this short reply in support of Plaintiffs’ Motion to Seal the Entirety of the Master Licensing Agreement or in the Alternative Sealing Portions of the Master Licensing Agreement (the “Motion to Seal”) (ECF No. 83), by which Plaintiffs seek to seal the highly confidential and sensitive Master Licensing Agreement entered into between Terran and UMB, dated May 7, 2021 (“MLA”).<sup>1</sup> Compass indicated that it does not oppose keeping the entire MLA under seal. *See* ECF No. 87 at 1. Plaintiffs thus respectfully urge the Court to keep the entire MLA under seal for the reasons stated in the Motion to Seal. *See* ECF No. 83.

As noted in Plaintiffs’ February 9 submission (ECF No. 83 at 4), the Court quoted a small portion of the MLA in its February 6 decision on Plaintiffs’ motion for leave to amend. ECF No. 79 at 30. Plaintiffs respectfully believe that the full MLA should be kept under seal because the portion that the Court quoted already is available to the public. As noted in Plaintiffs’ February 9

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<sup>1</sup> Plaintiff University of Maryland, Baltimore (“UMB”) has reviewed this submission and joins in the relief sought and the bases provided herein with respect to UMB.

submission (ECF No. 83 at 6 n.5), if the Court decides that the quoted text should not be kept under seal in the full copies of the MLA, Plaintiffs will promptly submit a proposed redacted version of the MLA, which redacts all content except for the portion quoted by the Court.

Dated: February 29, 2024

Respectfully submitted,

/s/ Ramsay M. Whitworth

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*Attorneys for Plaintiffs Terran Biosciences Inc. and Professor  
Scott Thompson*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29th day of February, 2024, a true and correct copy of *Plaintiffs' Reply in Support of Sealing the Entirety of the Master Licensing Agreement or in the Alternative Sealing Portions of the Master Licensing Agreement* was served via CM/ECF upon all counsel of record.

/s/ Ramsay M. Whitworth  
Ramsay M. Whitworth